Section 5: 510(k) Summary

SEP 1 3 2012

Submitted by: InnerOptic Technology, Inc

Contact: Caroline K. Green

Quality and Regulatory Manager

106-A N. Churton St. Chapel Hill, NC 27278 Ph. 919-732-2090

Email: caroline@inneroptic.com

Date Summary Prepared: 05/17/2012

Proprietary Name:

Аім

Common Name:

АIM Guidance System

Ultrasonic pulsed echo imaging system

Regulatory Class:

Class II per 21 CFR 892.1560

Product Codes:

IYO: system, imaging, pulsed echo, ultrasonic

OEW: tracking, soft tissue, intraoperative

Device Description: AIM is an accessory to ultrasound systems that provides guidance for the placement of needles or needle-like rigid objects, such as biopsy needles and ablation probes. The system enables a physician to accurately place a needle into a target anatomical structure by overlaying the image of the needle and its predicted future path on the ultrasound image of the internal organs in real time on a stereo monitor, for a "3D" effect (cf. IMAX 3D theaters).

AIM consists of four (4) principal components:

- (1) an electromagnetic position tracking system;
- (2) tracking sensors and mounts for the ultrasound transducer and the needle;
- (3) custom guidance software installed on a computer; and
- (4) a stereoscopic monitor with passive glasses for viewing the monitor.

Intended Use: AIM is indicated for enhancing the ultrasonic image of an interventional needle or needle-like rigid device, such as a biopsy needle, an

aspiration needle, or ablation needle, and for predicting its future path on a stereoscopic computer monitor screen which also shows the image of a B-scan (or similar display) of a medical ultrasound imaging system. The device is intended to be used in procedures where ultrasound is currently used for visualizing such procedures.

Technological characteristics, comparison to predicate device: The technological characteristics and indications for use of AIM are the same or similar to those found in the predicate device. AIM is substantially equivalent to InnerOptic's InVision System cleared in K083728.

The AIM device labeling contains instructions for use, including indications for use, cautions, contraindications, warnings and planning guidance. This information assures safe and effective use of this device.

Discussion of performance testing: Testing was conducted to evaluate the performance characteristics of AIM. A novice user made placement attempts in tumor mimics within agar phantom gels, both with and without AIM's guidance, at two different angles of approach – 0 degrees ("in plane"), and 90 degrees ("out of plane"). The novice's success rate with AIM's guidance was 92%, and without it was 8%. The results of these studies demonstrate that AIM is capable of safely and accurately performing the stated intended use. The results also show similar effectiveness to AIM's predicate device, the InVision System (K083728).

Conclusion: AIM is equivalent to the predicate device in safety and effectiveness.



Food and Drug Administration 10903 New Hampshire Avenue Document Control Room – WO66-G609 Silver Spring, MD 20993-0002

Ms. Caroline Green Regulatory Manager InnerOptic Technology, Inc. 106-A N. Churton Street HILLSBOROUGH NC 27278 SEP 1 3 2012

Re: K121479

Trade/Device Name: AIM

Regulation Number: 21 CFR 892.1560

Regulation Name: Ultrasonic pulsed echo imaging system

Regulatory Class: II

Product Code: IYO and OEW

Dated: August 15, 2012 Received: August 20, 2012

Dear Ms. Green:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into class II (Special Controls), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of

medical device-related adverse events) (21 CFR 803); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820). This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Parts 801 and 809), please contact the Office of *In Vitro* Diagnostic Device Evaluation and Safety at (301) 796-5450. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely Yours,

Janine M. Morris

Director

Division of Radiological Devices Office of In Vitro Diagnostic Device

Evaluation and Safety

Center for Devices and Radiological Health

Enclosure

510(k) Number:			
Device Name:	AIM .		
Indications for Us	se:		
AIM is indicated f	or enhancing	the ultrasonic	image of an interventional needle
needle-like rigid d	levice, such a	as a biopsy neo	edle, an aspiration needle, or ablat
needle, and for pre	edicting its fu	iture path on a	stereoscopic computer monitor scr
which also shows	the image of	a B-scan (or si	imilar display) of a medical ultrasor
imaging system. T	he device is i	intended to be a	used in procedures where ultrasoun
currently used for	visualizing su	ch procedures.	
			•
	,		
Prescription Use	X	AND/OR	Over-The-Counter Use
Prescription Use (Part 21 CFR 801		AND/OR	,
(Part 21 CFR 801	Subpart D)		(21 CFR 807 Subpart
(Part 21 CFR 801	Subpart D)	ELOW THIS LINE	(21 CFR 807 Subpart (
(Part 21 CFR 801	Subpart D)		(21 CFR 807 Subpart 0
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED	(21 CFR 807 Subpart (E-CONTINUE ON ANOTHER PAGE IF
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED	(21 CFR 807 Subpart 0
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED	(21 CFR 807 Subpart (E-CONTINUE ON ANOTHER PAGE IF
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED))
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED	(21 CFR 807 Subpart (E-CONTINUE ON ANOTHER PAGE IF
(Part 21 CFR 801 (PLEASE DO N	Subpart D) OT WRITE BE	ELOW THIS LINE NEEDED	(21 CFR 807 Subpart (E-CONTINUE ON ANOTHER PAGE IF